

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 1:22-MJ-90
	)	
KEIRA TA,	)	
	)	
<i>Defendant.</i>	)	
_____	)	

**AFFIDAVIT IN SUPPORT OF A CRIMINAL  
COMPLAINT**

I, David Dick, Special Agent of the Federal Bureau of Investigation ("FBI"), being duly sworn, depose and state that:

**INTRODUCTION**

1. I am an investigative or law enforcement officer of the United States, within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. I have been an FBI Special Agent since 2016. I am currently assigned to Squad CR-5 in the FBI's Washington Field Office, which conducts investigations targeting organized criminal enterprises. From 2005 to 2016, I was an investigator for the Norfolk Police Department in Norfolk, Virginia. From 2007 to 2016, I was assigned to the Special Operations Team, which supported the Norfolk Police Department Vice and Narcotics Division. In this capacity, I assisted the execution of search warrants, surveillance operations, apprehensions, and convictions of individuals involved in state and federal offenses.

2. The facts set forth in this affidavit are based upon my personal knowledge, knowledge obtained during my participation in this investigation, information obtained from other

law enforcement personnel, review of documents related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. I have not included in this affidavit every fact known to the United States in regard to this investigation, but rather only those facts which are necessary to establish probable cause.

3. I submit this affidavit in support of a criminal complaint charging the defendant, KEIRA TA, with knowingly and intentionally using intimidation and corruptly persuading another person with the intent to: (1) influence, delay, and prevent the testimony of any person in an official proceeding, and; (2) to cause or induce any person to withhold testimony in an official proceeding, and; (3) to cause or induce any person to be absent from an official proceeding to which such person has been summoned by legal process, in violation of Title 18, United States Code, Section 1512(b)(1) and (2).

#### **FACTS IN SUPPORT OF PROBABLE CAUSE**

4. On April 11, 2022, trial commenced in United States District Court for the Eastern District of Virginia, in Alexandria, Virginia, in *United States v. Peter Le, Joseph Lamborn, Tony Le, and Young Yoo*, 1:19-cr-57 (LO). Per the Court's instruction, the United States provided to the defense a witness list for the first two days of trial on Sunday, April 10, 2022.

5. The allegations in this trial include that these defendants were involved in the murder of an individual that had testified for the Commonwealth of Virginia against members of a criminal street gang.

6. At approximately 9 p.m. on April 11, 2022, the family of witnesses scheduled and subpoenaed to testify on April 12, 2022 contacted the Federal Bureau of Investigation (FBI) to

report that someone had posted a message on Instagram stating “WATCH THE SNITCHES SNITCHING, THIS WEEK TUES – THURS,” and listing five of the government’s witnesses and the address of the United States District Court. A copy of a screenshot of the Instagram post is attached as Exhibit A.

7. The caller to the FBI brought this post to the attention of the FBI out of concern for the safety of those individuals that were scheduled to testify as witnesses at trial.

8. On the morning of April 12, 2022, the family notified FBI that the post had been modified. During the late evening of April 11, 2022, or the early morning of April 12, 2022, this post was edited to include the phrase “Go watch the homies trial tomorrow,” and the hashtag “#freethehomies.” A copy of a screenshot of the updated Instagram post is attached as Exhibit B.

9. Business records obtained from Instagram indicate that the account that posted the messages referenced in paragraphs 6 and 8 (Exhibits A and B) is registered to Keira Ta, the defendant on or about January 22, 2022. Additionally, the defendant used phone number (714) 909-xxxx to register the account.

10. Instagram additionally provided the Internet Protocol (IP) addresses used to access the account on or about April 11, 2022, and those IP addresses resolve to locations in the Washington, DC area.

11. Investigation further revealed that on or about April 11, 2022 at 8:34 p.m., Tony Le, a defendant in the trial referenced in paragraph 4, called the defendant utilizing the PIN of co-defendant Joseph Lamborn. Records from the Alexandria Adult Detention Center indicate that Tony Le utilized (714) 909-xxxx, the same phone number used to register the Instagram account used to post the messages depicted in Exhibits A and B, to contact the defendant. Your affiant has

reviewed this call, which lasts approximately 23 minutes. During the call, the defendant discusses creating the Instagram posts depicted in Exhibits A and B, to include listing the names of the witnesses and referring to them as “Snitch.” The defendant also specifically states that she was posting the time frame Tuesday through Thursday, and listing the address of the courthouse in Alexandria, Virginia.

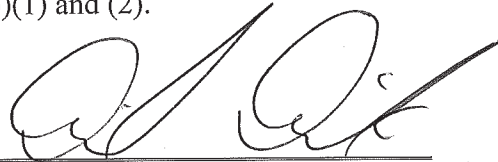
12. Additionally, during this call, Tony Le indicated that he would provide the witness list to the defendant on a daily basis during trial.

13. Based on my training, experience, and knowledge of this investigation, I believe that the defendant’s intent in posting the messages depicted in Exhibits A and B was to intimidate, threaten, and corruptly persuade the government’s witnesses to fail to testify, alter their testimony, and to be absent from the trial, an official proceeding to which such persons had been summoned by legal process.

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**CONCLUSION**

14. Based on my training and experience and the foregoing facts, I respectfully submit that there is probable cause to believe that on or about April 11, 2022, in the Eastern District of Virginia and elsewhere, the defendant, KEIRA TA, knowingly and intentionally using intimidation and corruptly persuading another person with the intent to: (1) influence, delay, and prevent the testimony of any person in an official proceeding, and; (2) to cause or induce any person to withhold testimony in an official proceeding, and; (3) to cause or induce any person to be absent from an official proceeding to which such person has been summoned by legal process, in violation of Title 18, United States Code, Section 1512(b)(1) and (2).



David Dick  
Special Agent  
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of  
Fed. R. Crim. P. 4.1 by telephone on April 12, 2022.

John F. Anderson

Digitally signed by John F.  
Anderson  
Date: 2022.04.12 13:01:13 -04'00'

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The Honorable John F. Anderson  
United States Magistrate Judge

# EXHIBIT A



# EXHIBIT B



